

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

VS.

CRIMINAL NO. 3:23-CR-70-GHD-RP

WILLIAM CARL SAPPINGTON

DEFENDANT

**ORDER**

This matter is before the court on the defendant William Carl Sappington's *pro se* "Motion for Bond Set or Reduction." ECF #20. The court previously conducted a detention hearing pursuant to the Bail Reform Act and concluded that detention is warranted. ECF #14. The defendant, who is represented by the Federal Public Defender, has now filed the instant *pro se* motion requesting a recognizance bond. The court finds the motion should be stricken, because when a defendant is represented by counsel, he or she does not have the right to file *pro se* motions.

"There is no constitutional right to hybrid representations whereby the defendant and his attorney act as co-counsel." *United States v. Long*, 597 F.3d 720, 724 (5<sup>th</sup> Cir. 2010); *see also* *United States v. Ogbonna*, 184 F.3d 447, 449 n.1 (5<sup>th</sup> Cir. 1999); *Myers v Johnson*, 76 F.3d 1330, 1335 (5<sup>th</sup> Cir. 1996). "Accordingly, when a defendant is represented by counsel, a district court may strike *pro se* motions." *United States v. Jones*, 842 F. App'x 878, 883 (5<sup>th</sup> Cir. 2021) (unpublished); *see also* *United States v. Alvarado*, 321 F. App'x 399, 400 (5<sup>th</sup> Cir. 2009) (unpublished); *United States v. Lopez*, 313 F. App'x 730, 731 (5<sup>th</sup> Cir. 2009) (unpublished); *United States v. House*, 144 F. App'x 416, 417 (5<sup>th</sup> Cir. 2005) (unpublished).

Therefore, the defendant's *pro se* "Motion for Bond Set or Reduction" [ECF #20] is STRICKEN.

SO ORDERED, this the 1<sup>st</sup> day of June, 2023.

/s/ Roy Percy

UNITED STATES MAGISTRATE JUDGE